

# **EXHIBIT T**

MICHAEL J. LINDELL  
SMARTMATIC USA vs LINDELL

June 11, 2024

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J11353479 eb

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA

SMARTMATIC USA CORP.,  
SMARTMATIC  
INTERNATIONAL HOLDING  
B.V., AND SGO  
CORPORATION LIMITED

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VS.

\* CASE NO. 22-cv-0098-WMW-JFD  
\*

MICHAEL J. LINDELL  
AND MY PILLOW, INC.

\*  
\*

VIDEOTAPED DEPOSITION OF MICHAEL JAMES LINDELL

Date

Edith A. Boggs, CSR

6-11-2024

HOUSTON, TEXAS

MICHAEL J. LINDELL  
SMARTMATIC USA vs LINDELL

June 11, 2024

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DEPOSITION OF MICHAEL JAMES LINDELL

DEPOSITION AND ANSWERS of MICHAEL JAMES LINDELL,  
taken before Edith A. Boggs, a certified shorthand  
reporter in Harris County for the State of Texas, taken  
at the Four Seasons Hotel, 1300 Lamar, Houston, Texas,  
on the 11th day of June, 2024, between the hours of 9:00  
a.m. and 5:56 p.m.

A P P E A R A N C E S

ATTORNEYS FOR PLAINTIFFS:

Benesch Friedlander Coplan & Aronoff  
71 South Wacker Drive, Suite 1600  
Chicago, Illinois 60606

By: Nicole Wrigley, Esq.  
and Julie Loftus, Esq.

ATTORNEY FOR DEFENDANTS:

McSweeney Cynkar & Kachouroff, PLLC  
13649 Office Place, Suite 101  
Woodbridge, Virginia 22192

By: Christopher Kachouroff, Esq.

ALSO PRESENT:

Ms. Avery Suarez, Videographer

REPORTED BY:

Ms. Edith A. Boggs

MICHAEL J. LINDELL  
SMARTMATIC USA vs LINDELL

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PROCEEDINGS

08:56AM

THE VIDEOGRAPHER: Good morning. We are now on the record. Today's date is June 11th, 2024, and the current time is 9:00 a.m. This begins the videotaped deposition of Mike Lindell.

08:56AM

09:00AM

09:00AM

09:00AM

Counsel, will you please introduce yourselves, and the witness will be sworn.

09:00AM

09:00AM

MS. WRIGLEY: Yes. Nicole Wrigley for the Smartmatic plaintiffs.

09:00AM

09:00AM

MS. LOFTUS: Julie Loftus also for the Smartmatic plaintiffs.

09:01AM

09:01AM

MR. KACHOUROFF: Chris Kachouroff for the -- counsel for both Mr. Lindell and MyPillow.

09:01AM

09:01AM

THE WITNESS: Michael James Lindell.

09:01AM

MICHAEL JAMES LINDELL

09:01AM

was called as a witness and, being first duly sworn by the notary, testified as follows:

09:01AM

09:01AM

EXAMINATION

09:01AM

Q. (BY MS. WRIGLEY) Good morning. Please state and spell your full name for the record.

09:01AM

09:01AM

A. Michael James Lindell, M-I-C-H-A-E-L, J-A-M-E-S, L-I-N-D-E-L-L.

09:01AM

09:01AM

Q. What is your home address, Mr. Lindell?

09:01AM

A. I don't know. I just got a new place last year. You can use 1550 Audubon Road, Chaska, Minnesota

09:01AM

09:01AM

MICHAEL J. LINDELL  
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1 Minnesota, millions of dollars worth, I think, and with  
2 my picture on them, and said, "Do you want this guy  
3 being your governor, another Trump-like person?"

4 And that's what your answer is referring  
5 to, that I'm referring to, they're very afraid. I go --  
6 I wasn't even going to run then, and they were afraid  
7 that I -- because I hadn't said anything. I was focused  
8 on getting rid of the electronic voting machines and  
9 going to paper ballots by that time, as you know.

10 Q. Did you -- in 2021, did you have any  
11 discussions with Steve Bannon about potentially running  
12 for governor --

13 A. No.

14 Q. -- in Minnesota?

15 A. No.

16 Q. Not a single conversation?

17 A. Not that I'm aware of. I -- that was the  
18 furthest thing from my mind. I was all about getting  
19 rid of electronic voting machines and going to paper  
20 ballots and counting. That was my whole focus 18 hours  
21 a day for the next three years.

22 Q. Now, Mr. Bannon responded to you and said, "Of  
23 course. Petrified."

24 A. Yeah.

25 Q. And then he said, "I would hold off on governor